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VITO A. GAGLIARDI, JR.
MEMBER, NJ BAR
CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
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June 27, 2022

VIA ECF

Honorable Douglas E. Arpert, U.S.M.J.
United States District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: CC Ford Group, LLC v. Jennifer Johnson
Civil Action No.: 3:22-cv-04143
Our Matter No.: 024196.091100

Dear Judge Arpert:

Please be advised that this office represents Plaintiff CC Ford Group, LLC with respect to the above-referenced matter.

We write, with the consent of counsel for Defendant Jennifer Johnson, pursuant to Fed. R. Civ. P. 6(b)(1)(A) and L.Civ.R. 6.1, seeking an extension of time for Plaintiff to amend the Complaint, and for the Defendant to Answer or otherwise plead in response to same, by way of the enclosed proposed scheduling order submitted on consent in lieu of filing a formal motion.

The parties jointly request that the Court enter this proposed order as they are in the process of submitting their dispute to a mediator. The timeframes set forth in this proposed order are designed to allow for the mediation to proceed before this litigation expands. The form of the enclosed proposed consent scheduling order has been approved by all counsel.

We therefore respectfully request that the Court consider and enter the enclosed proposed consent scheduling order. We can be available at Your Honor's convenience if you have any questions or require additional information.

ATTORNEYS AT LAW

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We appreciate Your Honor's kind consideration.

Respectfully,



Vito A. Gagliardi, Jr.

VAG:acr

cc: All Counsel of Record (via ECF)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

CC FORD GROUP, LLC,

Plaintiff,

v.

JENNIFER JOHNSON,

Defendant.

CIVIL ACTION NO. 3:22-cv-04143

**CONSENT ORDER
EXTENDING TIME TO
FILE AN AMENDED COMPLAINT,
AND TO ANSWER OR OTHERWISE
MOVE**

THIS MATTER having come before the Court upon the application of Plaintiff CC Ford Group, LLC, by and through its attorneys Porzio, Bromberg & Newman P.C., for entry of an order pursuant to Fed. R. Civ. P. 6(b)(1)(A) and L.Civ.R. 6.1 extending the time by which Plaintiff may file an Amended Complaint, and by which Defendant Jennifer Johnson may answer, move, or otherwise plead in response to Plaintiff's Complaint, and Defendant Jennifer Johnson, through her attorneys Critchley, Kinum & Luria, LLC, having consented to the entry of this Order: and no other parties having filed a notice of appearance or responsive pleading,

IT IS on this day of , 2022,

ORDERED that the time within which Plaintiff CC Ford Group LLC may file an Amended Complaint in this matter is hereby extended to be on or before **August 30, 2022**; and it is further

ORDERED that the time within which Defendant Jennifer Johnson may answer, plead, or otherwise move in this matter is hereby extended to be on or before **September 29, 2022**.

The undersigned hereby consent to the form and entry of this Order.

PORZIO, BROMBERG & NEWMAN, P.C.

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Attorneys for Defendant
CC Ford Group, LLC

Dated: June 27, 2022

By: s/ Vito A. Gagliardi, Jr.
Vito A. Gagliardi, Jr., Esq.

CRITCHLEY, KINUM & LURIA, LLC

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Tel.: (973) 422-9200
Attorneys for Defendant
Jennifer Johnson

Dated: June 27, 2022

By: s/Amy Luria
Amy Luria, Esq.